



Patrick J. Bernal
Partner
Phone 303.447.7185
Fax 303.957.2391
PJBernal@hollandhart.com

February 17, 2025

VIA ECF

Honorable Judge Gregory H. Woods
United States District Court
Southern District of New York
500 Pearl Street - Courtroom 12C
New York, NY 10007

**Re: *Simon Isakov v. Fjallraven USA, LLC, Case 1:25-cv-00714-JLR – Consented
Continuance for Responsive-Pleading Deadline***

Dear Judge Woods:

This firm represents Defendant Fjallraven USA, LLC (“Defendant”) in the above-referenced action.

Defendant’s deadline for responding to the Class Action Complaint and Demand for Jury Trial (“Complaint”) (ECF. No. 1) is February 25, 2025, based on service of process through the registered agent for Defendant on February 4, 2025. *See* Doc. 6.

Based on the above, Defendant respectfully requests that Your Honor grant a 30-day extension for Defendant to respond to the Complaint, to and including March 27, 2025. The extension is requested to allow the recently retained undersigned to fully investigate the allegations in the Complaint, including review of relevant information, facts, and documents, which will permit a fulsome discussion of an early settlement between the parties.

No previous requests for an extension of this deadline have been made. Counsel for Plaintiff Simon Isakov has graciously consented to a continuance of this deadline until March 27, 2025. The granting of this requested extension will not change any other scheduled dates based on this first extension.

Thank you for Your Honor’s attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Patrick Bernal', written over a light blue horizontal line.

Patrick Bernal
Partner
of Holland & Hart LLP

cc: All Counsel of Record via ECF

Location
1800 Broadway, Suite 300
Boulder, CO 80302

Contact
p: 303.473.2700 | f: 303.473.2720
www.hollandhart.com

Holland & Hart LLP Anchorage Aspen Billings Boise Boulder Cheyenne Denver Jackson Hole Las Vegas Reno Salt Lake City Santa Fe Washington, D.C.